

Message

From: Keller, Lynn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08038B86D66A47D3AACA8BEE1A63A5A7-LKELLER]
Sent: 5/21/2018 7:34:30 PM
To: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]
Subject: RE: Aerojet Area 40 Operable 10 Public Comment Period

None of Jackie or my comments were incorporated either, Alex.

Lynn M. Keller, EL, PMP
RPM & Acting Section Chief SFD-7-2
415-947-4162

US EPA Region 9
75 Hawthorne St, SFD-7-1
San Francisco, CA 94105

From: MacDonald, Alex@Waterboards [mailto:Alex.MacDonald@waterboards.ca.gov]
Sent: Monday, May 21, 2018 11:33 AM
To: Pickens, Tammy@DTSC <Tammy.Pickens@dtsc.ca.gov>
Cc: Fennessy, Christopher <christopher.fennessy@Rocket.com>; Keller, Lynn <Keller.Lynn@epa.gov>; Lane, Jackie <Lane.Jackie@epa.gov>; MacNicholl, Peter@DTSC <Peter.MacNicholl@dtsc.ca.gov>; Black, Stewart@Waterboards <Stewart.Black@Waterboards.ca.gov>
Subject: RE: Aerojet Area 40 Operable 10 Public Comment Period

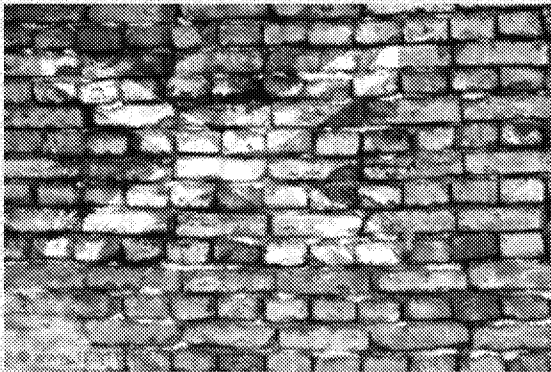
Tammy:

Below are my comments that I supplied to Peter last Thursday on the draft Public Notice. Most of the inaccuracies still remain and could cause significant issues with the CAG.

1. It is stated the land use covenants will restrict the land use to park and open space for the foreseeable future. In reality, those restrictions are place only on the areas that are proposed for parks and open space. There are other portions of Area 40 that will be allowed to be commercial and residential. These areas happen to be outside of the former source areas and areas of groundwater contamination. That could occur even if the cleanup values in the RAP are not met as those portions have only minor levels of contamination requiring no physical remedy with only a small swath of the northern portion of the south residential area requiring land use covenants for vapor intrusion mitigation.
2. Why are perchlorate, trichloroethene and dioxins capitalized in the second paragraph? Trichloroethene is preferred over trichloroethylene.
3. Recommend changing the second sentence in the second paragraph– “Perchlorate and TCE are also found in the groundwater, presenting a potential risk to human health and the environment.
4. Recommend changing the last sentence of the second paragraph to “DTSC and the Regional Water Quality Control Board . . . “
5. 3rd paragraph – check the 75-acre figure as there was discussion yesterday of 70 acres of park, 20 acres of open space, plus a large area of commercial and residential.
6. 3rd paragraph – recommend moving the last sentence up one sentence and changing it to “Prior to the Aerojet Lease, and after use by Aerojet, the Site was used as non-irrigated pasture.
7. 3rd paragraph – Second to last sentence. Recommend : “The site will remain a controlled open space until after remediation is sufficiently completed to allow the planned development.”

8. Page 2, first sentence. Change "Trichloroethylene" to TCE, delete "(TCE)", change "Dioxins" to "dioxins". Change "was" to "were" since we are referring to VOCs and not just TCE.
9. Page 2, second sentence. Do we want to say ambient air and not soil vapor? We already stated in the previous sentence that TCE was found in soil gas.
10. Page 2, Proposed Remedial Action, first sentence. Recommend adding "on the Site" or "on the property" after "place LUCs".
11. First bullet – LUCs will restrict only portions of the Site to park and open space. Southern area allowed to be commercial and residential development.
12. Third bullet – 3,400 feet of fencing around the most highly contaminated area
13. Fourth bullet – and assist with preventing soil vapor migration to other areas
14. Fifth bullet – impacted groundwater that has already migrated west of Prairie City Road and any additional migration from the site.
- Sixth bullet – delete "and the sumps" as they are part of the Site.

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From: Pickens, Tammy@DTSC [<mailto:Tammy.Pickens@dtsc.ca.gov>]
Sent: Monday, May 21, 2018 9:56 AM
To: Pickens, Tammy@DTSC <Tammy.Pickens@dtsc.ca.gov>
Subject: Aerojet Area 40 Operable 10 Public Comment Period

Greetings,

The Department of Toxic Substances Control encourages you to take this opportunity to review the attached project information. If you have any additional questions, please contact me for more details.

Sincerely,

Tammy Pickens
Public Participation Specialist

Department of Toxic Substances Control
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Sacramento, California 95826
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